



27 May 2003

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sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 118(i) and Table 118-C

Dear Mr. Pennington:

Comment

This subsection, and the accompanying Table, must be deleted.

Rationale

First of all, several later sections require “shall meet the applicable requirements of Sections 110 through 139.” This might lead many to believe that the code intends an outright ban on all non-white roofing in the state. Banning the vast majority of roofing systems is not at all necessary to meet the goals and requirements of this code; it would also make all of the “Overall Envelope Approach” and “Performance Approach” sections meaningless for roofing design. Such an act would obviously be arbitrary and capricious; let’s avoid the confusion and delete this subsection.

Secondly, the definition of “Cool Roofs” was created as a short-hand to expedite special short-term rebate programs during and immediately after the recent “energy crisis.” Those programs are (or soon will be) over.

This new code deals with the effects of the radiative properties of roof surfaces on the long-term conservation goals of the CEC much more carefully and accurately. The requirements of the proposed definition are inexact compared to the detail that the code now contains. This subsection is therefor not needed and conflicts with the rest of the code.

Instead, the purposes of the code would be best served – and the code simplified -- by consolidating all prescriptive requirements into Tables 143-A and 143-B (new numbering). By simply adding the requirements for reflectance and emittance to those Tables, we would collect all potentially conflicting references to these parameters (e.g. in Sections 141 (a) 1.B and 143 (a) 1.A, and the definitions of section 101) to point to the single and easy to maintain version in these Tables.

Finally, two additional points:

- Section 118 (i) 3 contains a specific requirement for a 20 dry mil coating thickness. This may have been justifiable during the emergency conditions under which this definition was originally crafted, particularly since those programs applied only to a single class of products (white acrylics). However, this parameter is in fact irrelevant to the durability of coatings. Under application (excess thinness) is related to durability; however, the specific value required varies substantially with the nature of the specific coating and its substrate. One particular “magic number” can not be justified as applicable to all possible coatings.
- I must again renew my objections to Table 118-C in its entirety. The properties mandated are completely unrelated to the durability of either the roof coatings themselves or of their radiative properties. (See my comment to Section 10-113 (a) for more detail.)

If you have any questions, please call me at (323) 908-5279.

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